

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TEYO JOHNSON,

Plaintiff,

v.

EVERYREALM INC., WILLIAM KERR in his individual and professional capacities, JANINE YORIO, in her individual and professional capacities, and JULIA SCHWARTZ, in her individual and professional capacities.

Defendants.

Index No. 1:22-cv-06669(PAE)(GWG)

**PLAINTIFF'S NOTICE OF
MOTION FOR LEAVE TO FILE A
SECOND AMENDED
COMPLAINT**

**NOTICE OF PLAINTIFF'S MOTION FOR LEAVE TO AMEND
COMPLAINT UNDER F.R.C.P. RULE 15**

Upon the exhibits attached hereto and the accompanying memorandum of law, Plaintiff Teyo Johnson (“Plaintiff”), through his undersigned counsel, moves before this Court for an order granting Plaintiff leave to amend the operative First Amended Complaint by filing a Second Amended Complaint in substantially the form attached to the Declaration of Shane Seppinni in support of this Motion as Exhibit C.

Dated: January 18, 2023
New York, New York

Respectfully submitted,

/s/ Shane Seppinni

Shane Seppinni
Seppinni LLP
43 W 43rd St., Suite 256
New York, NY 10036
212-849-7000

shane@seppinnilaw.com

Counsel for Plaintiff